

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,	§	Cr. No. A-20-CR-175 (LY)
Plaintiff,	§	
v.	§	
	§	
JOSHUA COLIN HONIGBERG,	§	
Defendant.	§	

GOVERNMENT'S NOTICE OF EXPERT WITNESS TESTIMONY

The United States Attorney in and for the Western District of Texas, Austin Division, by and through the undersigned Assistant United States Attorney, hereby files its notice of its intent to introduce expert witness testimony. The United States provides this notice pursuant to the Rules of Evidence and Federal Rule of Criminal Procedure 16.

The government submits the following:

The United States intends to call Senior Forensic Chemist Victor A. Bravenec of the Drug Enforcement Administration's Office of Forensic Sciences South Central Laboratory in Dallas, Texas with respect to his chemical analysis on evidence received in the laboratory related to charged criminal violation(s) filed of record in the above-entitled cause.

The United States expects SFC Bravenec to testify consistent with his RULE 16(a)(1)(G) SUMMARY OF TESTIMONY IN UNITED STATES V. Joshua Honigberg, as set out in his letter (attached) dated April 7, 2021.

SFC Bravenec will testify that he was employed by the Department of Justice, Drug Enforcement Administration as a forensic chemist when he conducted the examinations and analyses set out in his laboratory report(s). His qualifications to interpret the results described in his attached laboratory report(s) are based on his knowledge, skill, experience, and training. His experience, education and training is described in detail in his attached Curriculum Vitae.

SFC Bravenec's opinions described in the attached laboratory report(s) are based on chemical, physical, and/or instrumental analyses, the results generated by those analyses and SFC Bravenec's interpretation of those results.

SFC Bravenec examined and analyzed the substances contained in the exhibit(s) which were submitted for analysis in the LIMS case number referenced in his laboratory report.

The United States expects SFC Bravenec will testify that the substance he examined and analyzed contained in the exhibit submitted for analysis was identified to be Psilocin, a controlled substance, with an approximate net weight of 7.02 grams.

Beyond the scope and requirements of Rule 16, the United States has provided SFC Bravenec's full laboratory report, case details, chain of custody, instrument report, lab accreditation, proficiency test, summary of testimony and Curriculum Vitae in discovery to the Defendant, including, but not limited to the following:

- Rule 16 Summary of Testimony
- Curriculum Vitae of Victor Bravenec
- Laboratory Report
- Case Details Report
- Combined Instrument Report
- Chain of Custody
- Memo of Proficiency
- Expanded Chain of Custody
- Lab Certificate of Accreditation

Respectfully submitted,

ASHLEY C. HOFF
UNITED STATES ATTORNEY

/s/ **Grant Sparks**

By:

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2021, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant(s):

Ms. Charlotte Herring
Attorney for Defendant

/s/ **Grant Sparks**

Grant Sparks
Assistant U.S. Attorney